

ALLACCESS LAW GROUP
Irene Karbelashvili, SBN 232223
irene@allaccesslawgroup.com
Irakli Karbelashvili, SBN 302971
irakli@allaccesslawgroup.com
1400 Coleman Ave Ste F28
Santa Clara, CA 95050
Telephone: (408) 295-0137
Facsimile: (408) 295-0142

Attorneys for JAMES PEARSON, Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JAMES PEARSON,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITALS, et
al.

Defendants.

Case No. 2:20-cv-02335-MCE-KJN

**STIPULATION REGARDING FACT
DISCOVERY DEADLINE; ORDER**

1 Plaintiff JAMES PEARSON (“Plaintiff”) and Defendants KAISER
2 FOUNDATION HOSPITALS, THE PERMANENTE MEDICAL GROUP, INC. and
3 COMMONSPIRIT HEALTH (collectively, “Defendants”) stipulate, through their
4 undersigned counsel, that the deadline to complete fact discovery be continued to
5 January 13, 2022, in the event that this is not already the fact discovery deadline. This
6 Stipulation is being filed due to the following:

7 The Court’s Initial Pretrial Scheduling Order states that “[a]ll discovery, with the
8 exception of expert discovery, shall be completed no later than three hundred sixty—five (365)
9 days from the date upon which the last answer may be filed with the Court pursuant to the
10 Federal Rules of Civil Procedure.” Dkt. No. 3.

11 Plaintiff served Defendants with the summons, complaint, and related materials on or
12 about November 25, 2020. Thereafter, Plaintiff stipulated to extend each Defendant’s deadline to
13 respond to the Complaint. The Court granted the stipulations, extending Defendants’ deadline to
14 respond to the Complaint to January 13, 2021. Dkt. Nos. 6, 9.

15 As a result of the stipulations, the last date on which a Defendant could file an
16 answer became January 13, 2021. In light of the language in the Court’s Initial Pretrial
17 Scheduling Order, and in an abundance of caution, the Parties are filing this stipulation
18 in order to have the Court confirm whether they should accordingly calendar January
19 13, 2022, as the last date to conduct fact discovery in this matter. The Parties seek this
20 clarification not only to ensure that they have an accurate understanding of the fact
21 discovery deadline, but also to ensure that they have an accurate understanding of the
22 other case deadlines triggered by the fact discovery deadline.

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24 Respectfully submitted,

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26 Dated: November 18, 2021

27 /s/ Irakli Karbelashvili
28 By Irakli Karbelashvili, Attorney
for Plaintiff JAMES PEARSON

1 Dated: November 12, 2021

/s/ Ondrej Likar

2 By Ondrej Likar, Attorney
3 for Defendants KAISER FOUNDATION
4 HOSPITALS; THE PERMANENTE MEDICAL
5 GROUP, INC

6 Dated: November 12, 2021

/s/ Elizabeth B. Stallard

7 By Elizabeth B. Stallard, Attorney
8 for Defendant COMMONSPIRIT HEALTH, a
9 Colorado corporation, d/b/a ST. JOSEPH'S
10 BEHAVIORAL HEALTH
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ORDER

According to the Initial Pretrial Scheduling Order issued November 23, 2020, “[a]ll discovery, with the exception of expert discovery, shall be completed no later than three hundred sixty-five (365) days from the date upon which the last answer may be filed with the Court pursuant to the Federal Rules of Civil Procedure.” ECF No. 3, at 2 (emphasis added). Because the deadline for Defendant to file an answer was January 13, 2021, see ECF No. 9, the deadline to complete fact discovery is thus January 13, 2022.

Accordingly, having reviewed the Parties’ stipulation, and good case appearing, the deadline to complete fact discovery is confirmed to be **January 13, 2022**.

IT IS SO ORDERED.

Dated: November 22, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE